

IN THE DISTRICT COURT OF THE UNITED STATES  
DISTRICT OF SOUTH CAROLINA  
CHARLESTON DIVISION

UNITED STATES OF AMERICA ) CRIMINAL NO.: 2:19-cr-919  
 )  
 -versus- ) 18 U.S.C. § 1001(a)(2)  
 )  
 )  
**NADEEM GUL,** )  
**a/k/a CHOUDRY NADIEM GULL** ) INDICTMENT

COUNT 1  
(False Statement)

THE GRAND JURY CHARGES:

1. At all times relevant to this indictment, the United States Department of State was an agency of the executive branch of the Government of the United States.
2. At all times relevant to this indictment, the Charleston Passport Center was a facility operated by the United States Department of State, Bureau of Consular Affairs, for the filing, processing, and adjudication of Applications for United States Passports (forms DS-11) and U.S. Passport Renewal Applications for Eligible Individuals (forms DS-82).
3. At all times relevant to this indictment, the Charleston Passport Center was located at 1269 Holland Street, North Charleston, South Carolina.
4. On or about August 4, 2017, in the District of South Carolina and elsewhere, the defendant, NADEEM GUL, a/k/a CHOUDRY NADIEM GULL, in a matter within the jurisdiction of the executive branch of the Government of the United States, knowingly and willfully made materially false, fictitious and fraudulent statements and representations, in that he executed and submitted to the United States Department of State an U.S. Passport Renewal Application for Eligible Individuals (form DS-82), which was subsequently received at the

Charleston Passport Center, on which the defendant falsely stated that his name was CHOUDRY NADIEM GULL and falsely stated his date of birth. The defendant, NADEEM GUL, a/k/a CHOUDRY NADIEM GULL, knew that these statements and representations were false when made.

In violation of Title 18, United States Code, Section 1001(a)(2).

A TRUE BILL



SHERRI A. LYDON (dhs)  
UNITED STATES ATTORNEY

RECORD OF GRAND JURY BALLOT

C/ 2:19-cr-919

THE UNITED STATES OF AMERICA v. NADEEM GUL, a/k/a "Choudry Nadiem Gull"

(SEALED UNTIL FURTHER ORDER OF THE COURT)